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August 30, 2021

VIA ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
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9/7/2021

Re: *Ward v. SMG Media, Inc., 1:21-cv-04774 (CM)*



Dear Judge McMahon:

We represent Plaintiff Jesse Ward in the above-captioned case and write to respectfully request a 30-day adjournment of the initial case management conference scheduled for September 9, 2021.

- 1) The conference is currently scheduled for September 9, 2021 at 11:15 a.m. [Dkt. No. 8];
- 2) This is the first request for an adjournment and no previous requests have been granted or denied
- 3) An adjournment is requested because Plaintiff filed and served an amended complaint to substitute the defendant on August 23, 2021 [Dkt. No. 9]. Defendant SMG Media, Inc. ("Defendant") has until September 24, 2021 to respond to the complaint and has not yet appeared. Defendant does not oppose nor consent to this request because it has yet to appear.
- 4) No other scheduled dates will be impacted by this request.

Respectfully Submitted,

s/jameshfreeman/
James H. Freeman

Counsel for Plaintiff Jesse Ward